



164904

**Solutia Inc.**  
575 Maryville Centre Drive  
St. Louis, Missouri 63141

P.O. Box 66760  
St. Louis, Missouri 63166-6760  
Tel 314-674-1000

June 9, 2000

Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**  
• **June 2000 Monthly Report**

Dear Mr. McAteer,

Enclosed is the June 2000 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc:

T. Gouger - USACE  
C. Morin - IEPA  
Mayor M. King - Cahokia  
Sauget File - Solutia  
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** June 9, 2000  
**Period Covered:** May 1, 2000 - May 31, 2000  
**Next Report Period:** June 1, 2000 - June 30, 2000

---

#### **Work Performed during the reporting period**

All required field work for the Sauget Area 1 Support Sampling Plan ("SSP") was completed prior to this report period. During the month of May, the Solutia Sauget Team focused on continuing sample analyses and data validation.

---

#### **Data Submittal**

- There is no data to report this period. Additional validated data will be available for the next report in July.

---

#### **Work scheduled for next reporting period**

For the next several months, the Work will focus on completion of sample analyses; completion of data validation; and compilation / interpretation of the data.

---

#### **Problems and Solutions**

1. In a March 16, 2000 letter to EPA, Solutia requested permission to replace the Data Validation Plan prepared by Environmental Standards, Inc. ("ESI"), identified as Volume 4 of the approved September 9, 1999 Support Sampling Plan, with a February 2000 Data Validation Plan, Volumes I and II, prepared by O'Brien & Gere ("OBG"). This change request was necessitated when Solutia was unable to reach

agreement with ESI on the scope and cost of data validation, management and mapping for Sauget Area I Support Sampling Plan. As a result of these disagreements, Solutia solicited competitive bids and selected OBG based on the quality of their proposal, experience of their team and competitive price for data validation, management and mapping. Solutia believes there are no substantial differences between the two plans. This request remains under review by EPA.

---

### **Submittal Schedule Status**

See attached schedule - consistent with the approved SSP - as revised where indicated.

---

### **Issues under review**

#### **1. UAO to address flooding**

##### **Background**

U. S. EPA UAO - Docket No. V-W-99-C-554 - dated June 21, 1999 was issued to Solutia and received June 28, 1999. The UAO requires a time critical removal action to replace the culverts on Dead Creek to address flooding of Dead Creek. An alternative time critical removal proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove contaminated sediments from Sector B and contain in an on-site double lined containment cell. On November 8, 1999, Solutia submitted an evaluation of alternatives to an on-site containment cell for dealing with the contaminated sediments from Sector B.

After an Order was issued to Terminal Railroad, Solutia successfully concluded negotiations of an access agreement with Terminal Railroad on February 9, 2000, allowing Solutia to enter the property to perform the UAO required Work at the Terminal RR crossing. The geotechnical investigatory work for culvert replacement was completed immediately thereafter. Solutia also began to perform the clearing and grubbing portion of the Work on February 28, 2000.

Solutia completed the design of the culverts replacement project in March and obtained approval of U. S. EPA. Solutia also submitted the project design plans in March for review by the County, the Village of Cahokia, Laclede Gas, and Phillips Petroleum. As a result of review of the culverts design by the County, the Village, Laclede Gas and Phillips Petroleum, modifications were made and review begun in April.

---

### **This Report Period**

The re-design review of the culverts with the County, the Village of Cahokia, Laclede Gas, and Phillips Petroleum was held in May. Approval of the design was obtained and long delivery items placed on order. Field work will begin on the culverts replacement in late June.

A UAO was issued to Solutia by USEPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell.

### **Plans for Next Report Period**

1. Begin Work in the field on the culvert replacements as required by the June 28, 1999 UAO.
2. Prepare and submit a Time Critical Removal Action Work Plan pursuant to the May 31, 2000 UAO. Future progress on this UAO will be reported pursuant to the reporting requirements of the May 31, 2000 UAO. Monthly reports will begin 30 calendar days after USEPA approval of the Time Critical Removal Action Work Plan.

### **Comments:**

None

---

**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE**

**(11/99 Revision)**

- |  |   |
|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work  |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | Submitted February 22, 1999   |
| 5. Submit Revised SSP                                | April 8, 1999 <sup>2</sup><br>June 25, 1999 <sup>3</sup><br>August 13, 1999 <sup>4</sup><br><b>September 9, 1999<sup>5</sup> Approval</b> |
| 6. Obtain Access Agreements                          | July 1, 1999 <sup>6</sup><br>September 17, 1999 <sup>7</sup><br>October 1, 1999 <sup>8</sup>  |
| 7. Submit Health and Safety Plan (HASP)              | Approved September 9, 1999  |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved September 9, 1999  |

---

<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

<sup>3</sup> April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25<sup>th</sup> as required.

<sup>4</sup> June 25<sup>th</sup> SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

<sup>5</sup> August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

<sup>6</sup> Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

<sup>7</sup> Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

<sup>8</sup> Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

**January 21, 1999 Sauget Area I AOC**

**SCHEDULE (Cont.)**  
**(11/99)**

9. Sampling Notification	10 Business Days Prior to Start of Work <sup>9</sup>
10. Submit Data Report	01/09/01 <sup>10</sup>
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 <sup>11</sup>

---

<sup>9</sup> Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

<sup>10</sup> Per SSP - 16 mo. from SSP approval date of 9/9/99.

<sup>11</sup> Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10<sup>th</sup> of the month.